

Contingency Plan

Avery Landing Site
Avery, Idaho

for

**U.S. Environmental Protection Agency on Behalf
of Potlatch Land and Lumber**

March 4, 2013



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Contingency Plan
Avery Landing Site
Avery, Idaho

File No. 2315-016-02

March 4, 2013

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1.0 INTRODUCTION

This Contingency Plan has been prepared to describe the measures that will be considered and taken in the case of an emergency and to prevent and, if necessary, contain and clean up oil spills, ~~or~~ hazardous ~~wastematerial~~ spills, ~~or untreated groundwater~~ that may occur ~~on-Site~~ during ~~implementation construction~~ of the Avery Landing Removal Action. The purpose of this Contingency Plan is to establish procedures that will be utilized in the event of an emergency and establish procedures, methods, and equipment to prevent the release of oil, ~~or~~ hazardous materials, ~~or untreated groundwater~~ to water bodies or upland areas during ~~the Removal Action~~ ~~construction~~. This plan has been prepared based on project information available at the time it was prepared.

This Plan has been developed to provide the project staff with information and resources to respond in the case of an emergency and to prevent and respond to spills related to construction activities. The Plan recognizes that each spill likely presents a unique event requiring individual evaluation and response. This Plan therefore is intended to be utilized as a general guidance document. In the event of a spill, actions taken will be appropriate to the specific situation.

1.1. Project Personnel and Roles

The Avery Landing Removal Action will be performed by Potlatch Land and Lumber (Potlatch) and their contractors under oversight by the US Environmental Protection Agency (EPA). Pacific Pile and Marine (Cleanup contractor for Potlatch) will be responsible for the implementation of the removal action construction, improving/maintaining access roads, implantation and monitoring of Best Management Practices (BMPs), and spill prevention and control. GeoEngineers (environmental engineer for Potlatch) will be responsible for providing on-Site technical assistance, engineering support and for field-screening, collecting analytical samples, and documenting the removal action. Key personnel for the Avery Landing removal action are summarized in the following table.

Project Role	Name Organization	Telephone Email Address
Regulatory Project Manager/ On-Scene Coordinator	Earl Liverman EPA	208.664.4858 Liverman.earl@epamail.epa.gov Coeur d'Alene Field Office, 1910 Northwest Boulevard, Suite 208 Coeur d'Alene, Idaho 83814
Potlatch Project Manager	Terry Cundy Potlatch	208.301.0410 Terry.Cundy@potlatchcorp.com 530 S. Asbury, Suite 4 Moscow, Idaho 83843

Project Role	Name Organization	Telephone Email Address
Technical Project Manager	John Herzog GeoEngineers	206.406.6431 jherzog@geoengineers.com 600 Stewart Street, Suite 1700 Seattle, Washington 98101
Task Manager/Field Coordinator	Robert Trahan GeoEngineers	206.239.3253 rtrahan@geoengineers.com 600 Stewart Street, Suite 1700 Seattle, Washington 98101
Construction Foreman	Craig Cearley Pacific Pile and Marine	206.909.1798 craigc@pacificpile.com 582 S Riverside Drive Seattle, WA 98108

1.2. Physical Description and Site Contact Information

Site Name	Avery Landing Site
Site Location	The Site is located approximately one mile west of Avery, Idaho, on the north side of the St. Joe River. The site is located in the NW quarter of Section 16, Township 45 North, Range 5 East, Willamette Meridian, and is located at latitude 47 ° 13' 57" North and longitude is 115 ° 43' 40" West.
Property Size	Approximately 6 acres
Regulatory Site Contact	Earl Liverman, EPA On-Scene Coordinator
Nearest Residents	The eastern portion of the Site includes the Bencik property, a seasonally occupied residence.
Primary Land Uses Surrounding the Site	North: Highway 50 ("St. Joe River Road"), owned by the Federal Highway Administration (FHA). South: St. Joe River (rural/recreational) East: Rural/recreational West: Rural/recreational

1.3. Schedule of Work

Removal action activities being performed by Potlatch will be completed summer/fall of 2013. Post-removal action groundwater monitoring will be performed following completion of the removal action ~~construction~~ as approved by EPA. A schedule for mobilization/demobilization, sampling activities, and reporting are presented in the Avery Landing Removal Action Work Plan (Work Plan; GeoEngineers, 2013).

1.4. Historical and Background Information

Detailed information regarding Site and operational history, previous investigations and regulatory history and cleanup actions are presented in EPA's EE/CA (E&E, 2010) and/or [Potlatch's](#) Supplemental Investigation Report (GeoEngineers, 2011) and are summarized in the Work Plan.

1.5. Project Description

In general, EPA's selected removal action requires the excavation of subsurface soil contaminated with petroleum hydrocarbons (diesel and heavy oil). Removal of this material is expected to significantly reduce or eliminate the source of contamination at the Site and to prevent the continued discharge of petroleum hydrocarbons and hazardous substances into the St. Joe River. The oil and hazardous substances are comingled and cannot be segregated. Residual contamination remaining at the Site is expected to attenuate by way of natural processes and the progress of the attenuation will be monitored over-time, following the completion of the removal action.

The objectives of the removal action are to:

- Remove the remaining components of the product containment, collection, and extraction systems that were installed as part of the 1994 and 2000 removal actions;
- Remove soil exceeding field screening methods within the upland and river bank areas;
- Remove, treat, and/or manage petroleum product that is present as light Non-Aqueous Phase Liquids (LNAPL) on groundwater within the excavations;
- Dispose of waste streams in accordance with CERCLA's off-site rule requirements; and
- Restore portions of the Site affected by the removal action including river bank reconstruction, backfilling, compaction, grading and re-vegetation.

The conceptual design and preliminary approach for the removal action that will be performed by Potlatch is summarized in the Work Plan.

1.6. Coordination With Local and Federal Agencies

Potlatch and their contractors will coordinate with local law enforcement, Shoshone County, [Benewah County](#), and the United States Forest Service (USFS) during the implementation of this removal action. [Contact information](#) for these agencies is listed below:

- Shoshone County Planning Department – 208.752.8891
- USFS Avery Ranger District – 208.245.4517
- Shoshone County Sheriff Office – 208.556.1114
- Shoshone County Fire Department – 208.784.1188

Local law enforcement ([Benewah County Sheriff](#), Shoshone County Sheriff), Shoshone County, [Benewah County](#), and the USFS will be notified of the planned construction dates and the types, quantity and frequency of haul trucks that will be expected to be traveling to and from the Site in accordance with the Public Outreach Plan, included as Appendix F of the Work Plan.

Commented [EL1]: Include contact information for Benewah County.

2.0 HEALTH AND SAFETY

Construction activities will be completed in general accordance with the requirements of the Federal Occupational Safety and Health Act (29 CFR 1910, 1926). These regulations include requirements that workers are to be protected from exposure to contaminants.

A Health and Safety Plan (HASP) describing actions that will be taken to protect the health and safety of GeoEngineers personnel is provided in Appendix D of the Work Plan. The cleanup contractor for Potlatch will prepare a separate HASP for use by contractor personnel.

Commented [EL2]: As noted in Work Plan Comments, an integrated Site HASP (Potlatch, GeoEngineers, Pacific Pile and Marine) will be prepared and included with the revised HASP. Also, copies of the Potlatch and the Pacific Pile and Marine HASPs will be included.

3.0 CONSTRUCTION CONTINGENCY

3.1. Construction Site and Equipment

As part of Site preparation, access roads, construction staging areas, contaminated soil staging pads, water treatment area, and temporary facilities will be constructed to support the removal action. Construction of access roads and staging pads may require limited grading and placement of a geotextile and/or gravel on the graded surface. The actual locations of the temporary access roads, staging areas, equipment pads, temporary construction facilities (travel trailer, water treatment system, temporary utilities, etc.) and vehicle loading zones will be determined in the field prior to the start of the contaminated material soil excavation. Temporary staging, water detention and other facilities will be located in areas that will not interfere with construction operations or vehicle traffic.

Construction equipment expected to be used on-site is expected to include at least the following:

- Excavator(s);
- Off-road hauling trucks;
- Rollers;
- Fueling trucks;
- Water trucks; and
- Support vehicles.

Commented [EL3]: Revise to include the water treatment system and portable generators if used on-Site.

3.2. Spill Planning and Prevention

3.2.1. Training

All employees working for the cleanup contractor will have received training on the proper procedures for Spill Response Containment, CPR/First Aid, 40 hour Hazardous Waste Operations training in accordance with 29 CFR 1910.120 with annual 8 hour refresher training, Trenching and Excavation Competent Person Training and Confined Space Entry Training (if conditions warrant).

Commented [EL4]: Specify whether employees working for Potlatch (e.g., Cundy) and GeoEngineer (e.g., Herzog, Trahan) possess the 40-hour HAZWOPER training.

3.2.2. Spill Response Materials and Equipment

Spill prevention kits will be stored at designated locations such as fueling and hazardous material storage areas at the Site. Spill prevention kits Spill Kits will, at a minimum, the following:

- Spill response procedures sheet;
- Oil absorbent pads;
- Water-based absorbent pads;
- Plastic sheeting;
- 5-gallons of loose absorbent material (i.e., kitty litter, floor sweep or similar);
- Heavy duty garbage bags;
- Shovel;
- Broom; and
- Spill report form.

Supplies used will be replaced to protect the integrity of spill response efforts at the Site. All personnel will be informed on the location of the spill prevention kits [and will be familiar with spill prevention and response procedures](#) prior to the start of work.

3.2.3. **Inspections and Security**

The cleanup contractor will conduct [daily visual inspections](#) at the Site. Inspections for leaks, corruptions, or damage that could lead to a discharge of oil, ~~or other~~ hazardous material, ~~or untreated groundwater~~ will include an examination of all on-site fuel storage tanks, construction equipment, fire protection equipment, and spill response equipment.

Security measures will be implemented on-site to prevent unauthorized access to fuel storage, material storage, and excavation areas. Temporary fencing, barricades, signage and/or traffic control flaggers will be used, as necessary, to control access to the Site both during working and non-working hours. As part of the construction mobilization, the cleanup contractor for Potlatch will be responsible for installing fencing and/or other means to restrict general public access to work areas (i.e., construction staging, materials management, and excavation water detention areas) at the Site. Site access control will be maintained for the duration of the project.

3.2.3.1. **CONSTRUCTION STAGING AREA**

The staging area will be inspected daily for any spills or leaks. A spill resulting from equipment leaks including fuel tanks, equipment seals, or hydraulic lines will be immediately contained by using a spill pan or spill pad placed beneath the leak source. An undetected leak from parked equipment will, at minimum, be contained within the equipment staging area by a temporary berm.

3.2.3.2. **FUELING STORAGE AREA**

A fueling area will be designated for all refueling on the Site. This fueling area will be located in an upland area at least 100 feet away from the St. Joe River. All fuel tanks will be stored within a secondary containment, preferably enclosed or covered. The proper equipment will be used to transfer fuel. Spill response equipment and fire extinguishers will be stored in a readily accessible location known by all construction personnel.

Commented [EL5]: If present, portable generators will also be included as part of the inspection procedure.

Commented [EL6]: Include a statement regarding the shared responsibility for inspections by all employees throughout the work day.

Commented [EL7]: A SPCC Plan will be required if the aggregate aboveground storage capacity exceeds 1,320 gallons of oil.

During non-working hours, flow and drain valves for fuel tanks will be securely locked in the closed position. Additionally, when not in use construction equipment used during the removal action will be securely locked to prevent unauthorized use.

The fueling area will be inspected daily for any spills or leaks. A spill during fueling operations will be contained and cleaned up immediately. The transfer of fuel into portable equipment will be performed using a funnel and/or hand pump, and a spill pad used to absorb any incidental spills/drips.

3.2.3.3. SOIL STOCKPILE AREA

Stockpile areas will be inspected daily. Any material lost as a result of wind, rain, erosion or overfilling of contaminated staging pads will be contained and cleaned up.

3.2.3.4. WATER TREATMENT AREA

The water treatment system (i.e., pipes, hoses, connection points, etc.) will be inspected daily for leaks. Observed leaks will be immediately contained by using a spill pan or temporary berm to prevent erosion and potential release of hazardous substances to the ground surface.

Commented [EL8]: Secondary containment will be provided for the water treatment area.

3.2.3.5. TEMPORARY HAUL ROADS

Temporary haul roads will be utilized during the removal action to transport equipment or materials during the removal action will be inspected daily. Incidental spills (e.g., fuel or oil leaks) from hauling equipment operating on the haul roads will be contained and cleaned.

3.2.4. Secondary Containment

Material handling and storage will be located in designated areas. Secondary containment will be used to contain any spills that could occur in these areas. Secondary containment is a safeguarding method used to prevent unplanned releases of toxic or hazardous compounds into uncontrolled work areas. Examples are the use of spill pallets, berms, liners, or containment walls. The choice of secondary containment for the material handling and storage areas will be decided after consultation with the construction contractor.

Commented [EL9]: This statement is unacceptably vague. Describe methods planned for containment .

3.3. Spill Response

3.3.1. Spill Response Procedures

Any site worker that observes a leak or spill will immediately respond to the situation by first attempting to stop the source of the leak or spill and turn off any ignition sources in the area. The employee will then alert personnel in the area of the spill and restrict access as needed and contact the on-site safety coordinator. On-site personnel, equipment, and materials will be mobilized to clean up the spill.

Commented [EL10]: Describe what happens if the incident exceeds the capacity of on-site personnel and resources.

If a spill or release cannot be controlled or injuries have occurred due to the release the following procedures should be followed:

- Summon help and alert others in the vicinity of the release.
- Evacuate immediate area, and provide care to anyone injured. Call 9-1-1 and follow the emergency procedures specified in the HASP. Note that a land based telephone line may be required if cell phone coverage is determined to be unreliable.

- If potential fire or explosion hazards exist initiate evacuation procedures. Call 9-1-1.
- Respond defensively to any uncontrolled spill.
- Use appropriate personal protective equipment when responding to any spill, as described in the HASP.
- Protect drains and/or surface water (river) by use of absorbent, booms and/or drain covers.
- Notify the on-site safety coordinator [and the EPA On-Scene Coordinator](#).
- Notify other trained staff to assist with the spill response and cleanup activities.
- Coordinate response activities with local emergency personnel (fire department), if necessary.
- Be prepared to provide MSDS information to fire department, EMT, hospital or physician, if necessary.
- Notify appropriate agency if a release has entered the environment. Refer to spill notification requirements specified in Section 3.4.

3.3.2. Spill Containment/Cleanup – Upland Areas

In the event of a spill or release to the ground, cleanup operations will begin as soon as possible maximize the recovery amount of the spilled material and to minimize potential environmental impacts. General procedures for ground spills are:

1. **Stop the spill** – The leak or spill should be stopped by turn off nozzles or valves from the leaking container or shutting off the construction equipment, if it can be done safely. Use a wooden plug, bolt, band or putty on a puncture-type hole if possible.
2. **Contain and recover the spill** – If the spill or leak cannot be stopped, catch the flowing liquid using a pan, pail, hubcap, shovel or whatever is available. Spreading sorbent material, such as kitty litter, sand, straw, sawdust, wood chips, peat, sorbent pads, or dirt can stop the flow and soak up the petroleum.
3. **Collect the contaminated sorbent** – Brooms and shovels can be used to pick up the sorbent material and put it into buckets, garbage cans or barrels, on top of plastic sheeting or in steel drums. Fresh granular sorbent such as sand can then be re-spread on a roadway to control the residual slipperiness.
4. **Secure the waste** – Contaminated material generated by the spill will be contained on [Site](#) pending disposal at a facility permitted to receive the waste.

Spills that occur in upland areas of the Site will be cleaned up immediately and in compliance with state and federal laws and regulations. Materials supplied closest to the spill location will be used to contain the spill and divert any material from entering the nearby water bodies. Spilled material and contaminated soils will be collected and placed in labeled and sealed drums or stockpiled and secured pending off-Site permitted disposal. All affected areas, equipment, and surfaces that have contacted the spilled material will be decontaminated. The waste generated in cleaning up the spill will be disposed of in accordance with the applicable state and federal regulations.

Spills that occur off of the Site during transport of contaminated materials are the responsibility of the transport company. The transport company will notify the appropriate authorities and Potlatch in the event that contaminated material generated from the Site is released. Potlatch will require the transporter to provide documentation that the spilled material has been cleaned up in compliance with applicable Federal, State and local regulations.

3.3.3. Spill Containment/Cleanup – In-Water Areas

In the event of a spill or release to the St. Joe River, cleanup operations will begin as soon as possible to maximize the recovery amount of the spilled material and to minimize potential environmental impacts. General procedures for water spills are:

1. **Stop the spill** – The leak or spill should be stopped by turn off nozzles or valves from the leaking container or shutting off the construction equipment, if it can be done safely. Use a wooden plug, bolt, band or putty on a puncture-type hole if possible.
2. **Contain and recover the spill** – Oil containment booms and/or absorbent materials downstream of the spill source will be deployed to contain the spill.
3. **Collect the contaminated sorbent** – Recovery of any liquid spill material into water is to be initiated immediately with, skimmers, skimming pumps and/or absorbent materials.
4. **Secure the waste** – Recovered product will be transferred to the on Site water treatment system to be processed.

If necessary, an Emergency Response Contractor may be called to contain and clean up the spill. The National Response Center and the State of Idaho Communication Center will also be notified of the incident. All affected areas, equipment, and surfaces that have contacted the spilled material will be decontaminated. The waste generated in cleaning up the spill will be disposed of in accordance with the applicable state and federal regulations.

3.4. Spill Notification

If any incident or change in Site conditions during the work causes or threatens to cause a release or discharge of oil, hazardous material or substance, or untreated groundwater from the Site or an endangerment to public health or the environment, the EPA OSC or EPA representative will be notified immediately. Spills or releases of oil or hazardous materials or substances into the environment may require additional notification to one or more Federal or State agencies. The release reporting requirements are dependent on the substance release, the location of the release, and the time period when the release occurred.

- Spills of petroleum products, which cause sheen on the waters of the US, ~~or exceed 25 gallons,~~ will be considered a reportable spill.
- Spills of hazardous materials or of hazardous waste, which exceed their reportable quantities, are a reportable spill.
- The person discovering the spill should report the release immediately to the cleanup contractor foreman. The foremen will gather information that is immediately available on the release and inform the environmental contractor, Potlatch, and federal on-scene coordinator.

Commented [EL11]: Indicate whether personnel will be trained and properly equipped to respond to releases to the river.

Commented [EL12]: Indicate whether this equipment will be stored on-Site and where it will be located.

Commented [EL13]: According to the general procedures in Sections 3.3.2 and 3.3.3., the first step for the person discovering a spill is to stop the spill, not report the spill.

Spills of oil in harmful quantities must be reported to state and federal agencies. A harmful quantity is any quantity of discharged oil that violates state water quality standards, causes a film or sheen on the water's surface, or leaves sludge or emulsion beneath the surface. Phone numbers for reporting a discharge to the National Response Center and other federal and state agencies are provided below.

Spill Notification Contacts:

- National Response Center (NRC) – 800.424.8802
- EPA Region 10 24-Hour Spill Reporting Number – 206.553.1263
- Idaho Communication Center – 800.632.8000

If any doubt exists on the report-ability of the release, the release will be reported.

4.0 EMERGENCY RESPONSE PLAN

The HASP, which will be located on-site for the duration of the project, includes directions to the nearest hospital and should be the primary reference for emergency procedures during any emergency.

4.1. Emergency Contacts

Cell phones will be carried by all Site personnel, however if cell phone coverage is not available at the Site, the contractor will have access to a land-based phone, and the location of the land-based phone will be known by all employees.

Emergency Contacts	
Ambulance/Police/Fire	9.1.1
Statewide Medical Emergency Response	208.846.7610
Northwest Medstar (Helicopter Evacuation)	800.422.2440
Shoshone Medical Center	208.784.1221
Avista Emergency Utility Line Locate	800.227.9187
Avista Utility Line Locate (Benewah and Shoshone Counties)	800.398.3285
State Response Center	800.632.8000
National Response Center (NRC)	800.424.8802
EPA Region 10 24-Hour Spill Reporting Number	206.553.1263
Idaho Communication Center	800.632.8000
Idaho Department of Lands (St. Maries)	208.245.4551
United States Forest Service (St. Maries)	208.245.2531
Benewah County (St. Maries)	208.245.2555

Commented [EL14]: Suggest the USFS Avery Ranger District also be listed.

Shoshone County (Wallace)	208.556.1114
Poison Control	800.732.6985

4.2. Injury/Accident Emergency Procedures

Get help -

- Send another worker to call 9-1-1 (if necessary).
- As soon as feasible, notify Potlatch Project Manager.

Reduce risk to injured person -

- Turn off equipment.
- Move person from injury location (if in life-threatening situation only).
- Keep person warm.
- Perform CPR (if necessary).

Transport injured person to medical treatment facility (if necessary) -

- By ambulance (if necessary) or contractor vehicle.
- Stay with person at medical facility. The nearest hospital is located in Wallace, ID and a map to the nearest hospital is included in the HASP presented in Appendix D of the Work Plan.

4.3. Fire Emergency Procedures

- Notify all personnel within the immediate area of the fire.
- Evacuate the area in the event the fire cannot be extinguished safely.
- Go directly to the closest telephone and contact the Fire Department by calling 9-1-1.
- Notify the on-site safety coordinator.

4.4. Accidental Disruption of Utilities

Prior to starting work actions will be taken to locate utilities at the Site. The following provides the procedure for the accidental disruption of utilities.

- Notify all personnel within the immediate vicinity, shut down all equipment.
- If the accidental release of natural gas is caused by contact with an underground utility, evacuate the area if the release of gas cannot be secured safely.
- Notification of on-site safety coordinator immediately.
- On-site safety coordinator will contact Potlatch and will take appropriate actions including, but not limited to, contacting the appropriate utilities and/or Shoshone County.

5.0 LIMITATIONS

We have prepared this Site Specific Sampling Plan for use by the Potlatch Land and Lumber during the removal action at the Avery Landing Site. Within the limitations of scope, schedule and budget, our services have been executed in accordance with generally accepted environmental science practices in this area at the time this report was prepared. No warranty or other conditions expressed or implied should be understood.

Any electronic form, facsimile or hard copy of the original document (email, text, table, and/or figure), if provided, and any attachments are only a copy of the original document. The original document is stored by GeoEngineers, Inc. and will serve as the official document of record.

6.0 REFERENCES

E & E (Ecology and Environment, Inc.), "Draft Final Engineering Evaluation /Cost Analysis, Avery Landing Site, Avery, Idaho," prepared for the United States Environmental Protection Agency, Region 10, dated December 2010.

GeoEngineers, Inc., "Draft Removal Action Work Plan, Avery Landing Site, Avery, Idaho" prepared for United States Environmental Protection Agency on Behalf of the Potlatch Land and Lumber, dated March 4, 2013.

GeoEngineers, Inc., "Supplemental Site Investigation, Avery Landing Site, Avery, Idaho," GEI File No. 2315-016-01, prepared for Potlatch Forest Holdings, Inc., dated November 9, 2011.